

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 17-CR-30201-NJR-1
GEORGE RHODES)
Defendant.)

COUNSEL'S RESPONSE TO ORDER TO SHOW CAUSE

NOW COMES, attorney QUINN A. MICHAELIS, counsel for defendant GEORGE RHODES, submits the following explanation to this Honorable Court as to why her *pro hac vice* admission should not be revoked and why she should not be held in contempt of court.

1. On October 30, 2018, This Court set the above captioned case for status hearing on the availability of counsel for the upcoming trial date of November 27, 2018.
2. The status hearing was held on November 2, 2018, and the undersigned counsel failed to appear. The court subsequently entered an Order for Rule to Show Cause (Doc. 40) requiring counsel to provide the court with an explanation as to why her *pro hac vice* admission should not be revoked and she should not be held in contempt of court for failing to appear at the scheduled status date.
3. Counsel had previously been traveling for work purposes prior to the scheduled status hearing, both to Louisiana and Texas, beginning October 13, 2018 through November 1, 2018. While counsel was in Texas, she was providing *pro bono* legal representation to detained asylum seekers, which left her without phone access or internet for approximately 12 hours each day. Counsel did not regularly check her email or voicemail while she was away from the office, and did not see the docket entry or email from the court regarding the status hearing until after the scheduled hearing had concluded.
4. Upon her return to the office and seeing the docket entry and emails, the undersigned counsel realized she had missed the scheduled status hearing and immediately left a voicemail message

for the Court's courtroom deputy. She further contacted counsel for the government that same afternoon on November 2, 2018. Counsel also contacted both Mr. Rhodes and his family following her conversation with the government to address any concerns her absence caused. Counsel has further assured both the government and Mr. Rhodes that she will remain in contact with them through the conclusion of this case. Furthermore, as Mr. Rhodes' trial date is impending, his case remains a priority for the undersigned counsel and she is frequent contact with Mr. Rhodes and his family since her return to the office.

WHEREFORE, the undersigned counsel prays that this Honorable Court does not revoke her *pro hac vice* admission to the Southern District of Illinois, and not hold her in contempt of court for failing to appear at the November 2, 2018 status hearing.

Respectfully submitted,

/s/Quinn A. Michaelis

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2018, I electronically filed the above

COUNSEL'S RESPONSE TO THE ORDER TO SHOW CAUSE

with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on November 9, 2018.

By His Attorney,

s/ Quinn A. Michaelis

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